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AO 91 (Rev. 11-01-03) Criminal Complaint

AUSA Heather K. McShain (312) 353-1414

JUN 02 2014
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JONATHAN WILLIAMS

CASE NUMBER:

14 CR 314

14 CR 314
MAGISTRATE JUDGE
GERALDINE SOAT BROWN

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about April 19, 2014, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

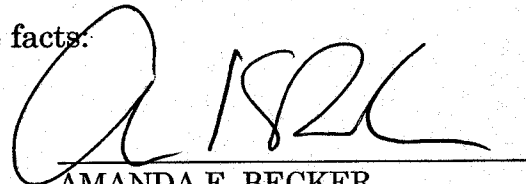
Title 18, United States Code, Section
2113(a)

Offense Description

by force and violence, took from the person or presence of another any other thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, namely, BMO Harris Bank, located at 4959 West North Avenue, Chicago, Illinois.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

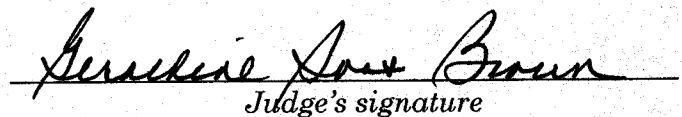


AMANDA E. BECKER

Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: June 2, 2014


Judge's signature

City and state: Chicago, Illinois

GERALDINE SOAT BROWN, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

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AFFIDAVIT

I, AMANDA E. BECKER, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed for about 2 years. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that JOHNATHAN WILLIAMS has violated Title 18, United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging WILLIAMS with bank robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, conversations I have had with others who have knowledge of the events and circumstances described herein, interviews of bank employees and other witnesses, and review of bank surveillance photographs and video.

A. Robbery One: The Robbery of BMO Harris Bank on April 19, 2014.

4. According to witnesses and bank employees, as well as review of surveillance photographs and video, on April 19, 2014, at approximately 10:50 a.m., two black males robbed BMO Harris Bank, located at 4959 West North Avenue in Chicago, Illinois ("the bank"). Specifically, two black males entered the bank (I will refer to the two black males as "Robber One" and "Robber Two"). The surveillance video shows that Robber One and Robber Two approached the bank together, while Robber Two appeared to guard his face from the cameras. Robber One approached the bank teller ("Teller One") at the counter, and inquired about opening an account. Teller One informed Robber One he would need two forms of identification or he could use the computer near the front door. As Robber One approached Teller One, Robber Two stayed near the customer service desk and acted as if he were filling out a deposit/withdrawal slip. Robber One next said, in effect, "open your drawer," while displaying a silver/grey revolver with a long barrel pointed at Teller One. Teller One grabbed money from the top drawer which included hundreds, fifties, twenties, tens, fives, singles and bait money. Teller One handed the money to Robber One and closed his/her top drawer. Teller One asked Robber One if he needed a bag. Robber One responded, "No. Open your drawer and give me everything." Teller One reopened his/her drawer and gave Robber One approximately \$2,000. Robber One was shifting his eyes from side to side. Robber One then stated to another bank employee ("Employee One"), "I saw you move." Teller One told Robber One the Employee One did not move. Teller One asked

Robber One if he wanted the rolled change. Robber One responded, "No." Robber One and Robber Two exited out the front door of the bank.

5. Robber One was described as a black male, wearing a grey hoodie, black skull cap, blue jeans and was between 5'7" and 5'10". Robber Two was described as a black male in his mid 20s and approximately 5'10", wearing black shoes, black jeans, a red jacket and black skull cap with a red stripe.

6. According to information provided by the bank, the teller handed over approximately \$8,509 in United States Currency to Robber One. According to bank employees, the deposits of the bank were insured by the Federal Deposit Insurance Corporation at the time of the robbery.

B. Robbery Two: The Robbery of Banco Popular on May 29, 2014, and a Silver Van with Plates Registered to Jonathan Williams.

7. On May 30, 2014, Lavert Pitts was charged by criminal complaint in case 14 CR 311 with one count of bank robbery, relating to the robbery of Banco Popular, located at 3956 West North Avenue in Chicago, Illinois, at approximately 2:20pm on May 29, 2014 ("Robbery Two"). Relevant to the instant complaint is a silver van ("Van One") that was used as the getaway car by Pitts and an uncharged accomplice following the robbery of Banco Popular on May 29, 2014. As detailed below, Van One bore Illinois plates registered to Jonathan Williams.

8. Minutes following the robbery of Banco Popular, at approximately 2:25 pm, a Chicago Police Department Sergeant ("Officer One"), in an unmarked police vehicle in the vicinity of Banco Popular, heard a call over his radio to be on alert for two bank robbery suspects involved in a bank robbery at 3956 West North Avenue

in Chicago, described as two black males in a silver minivan. At the intersection of Hamlin and Ohio Streets (approximately 1.5 miles south of the bank), Officer One observed Van One with two black male occupants. Officer One followed Van One and radioed for assistance and provided Van One's license number, Illinois license plate V327856.

9. Officers lost sight of Van One but at approximately 2:48 pm, another Chicago Police Department Officer ("Officer Two"), who had been following the radio calls, spotted a silver 2000 Dodge minivan bearing Illinois license plate V327856 (i.e., Van One) parked at 4424 West Fulton in Chicago, Illinois (approximately one-half mile from the intersection of Lake and Pulaski Streets).

10. Officer Two approached Van One and observed no occupants and that the front passenger window of the van was open. Through the back windows of the van, Officer Two observed on the back passenger bench seat a hat which matched the description of the hat that was worn by Pitts during the robbery of the bank. Officer Two observed on the grassy extension area between the sidewalk and the curb next to where Van One was parked two t-shirts and a second hat, also matching the description of items worn by Pitts and his accomplice.

11. Along with bearing Illinois license plate V327856, officers also observed through the windshield that Van One bore Vehicle Identification Number ("VIN") 2B4GP2430YR719578. Using law enforcement databases, officers learned that the Illinois license plate V327856 on Van One was registered to Johnathan Williams, located at an address on Fulton Avenue (approximately 1.2 miles away

from where Van One was parked), but to a silver 2000 Dodge minivan bearing VIN 1B4GP44L6YB654682 ("Van Two"). In other words, it appeared that the plates located on Van One and registered to Williams belonged to a different vehicle, namely Van Two.

C. Williams is Identified as Robber Two and Van Two is Located.

12. Relating to the license plate registered to Williams and located on Van One, on May 29 and May 30, 2014, law enforcement attempted to locate Williams and left messages with individuals believed to be in contact with Williams.

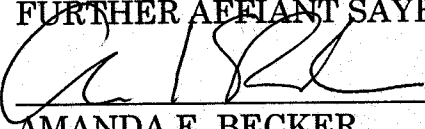
13. On May 31, 2014, Williams contacted FBI Agents and agreed to be interviewed. At approximately 1:30 pm, Williams waived his *Miranda* rights and agreed to speak to law enforcement officers. Among other information, Williams stated that he and Robber One robbed a bank on North Avenue about a month ago. I believe this to be Robbery One detailed above, the robbery of BMO Harris Bank, located at 4959 West North Avenue in Chicago, Illinois, on April 19, 2014. According to Williams, he drove his silver minivan ("Van Two") and parked the minivan at a strip mall nearby. Williams and Robber One walked to the bank and upon entering, Robber One approached the teller counter. Williams stated he stayed in the back of the bank by the customer service desk (which matches the account of bank employees as to Robber Two). After the bank teller gave Robber One the money, Williams and Robber One exited the bank.¹

¹ While Williams maintained that he was Robber Two, he refused to identify himself in surveillance photos and stated that he wore a black hoodie during the robbery, which

14. At approximately 2:15 p.m., Williams gave consent to search Van Two. Amongst the items seized was a black skull cap with red stripe, which matched the description provided by bank employees and video surveillance of the hat that Williams wore during the bank robbery of BMO Harris Bank on April 19, 2014. At approximately 2:30 pm on May 31, 2014, Williams was placed under arrest and continued to speak to agents.

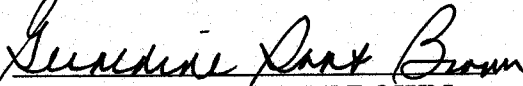
15. With respect to how Illinois license plate V327856 got on Van One involved in Robbery Two, Williams stated that he permitted the use of his license plate. Williams also stated that he and a female accomplice staked out Banco Popular prior to Robbery Two, but that Williams was dropped off prior to the robbery.

FURTHER AFFIANT SAYETH NOT.


AMANDA E. BECKER

Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on June 2, 2014.



GERALDINE SOAT BROWN
United States Magistrate Judge

does not match the witness descriptions or video surveillance of Robber Two wearing a red jacket and black skullcap with red stripe.